

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**TREVOR FITZGIBBON,**

**PLAINTIFF**

**vs.**

**JESSELYN A. RADACK,**

**DEFENDANT**

**Civil Action No. 3:19-cv-477-REP**

**MOTION TO DEFER CONSIDERATION OF PLAINTIFF’S MOTION FOR  
SUMMARY JUDGMENT AND FOR EXTENSION OF THE SUMMARY JUDGMENT  
DEADLINE PURSUANT TO FED. R. CIV. P. 56(d)**

Defendant Jesselyn A. Radack (“Radack”), by counsel, files this Motion to Defer Consideration of Plaintiff’s Motion for Summary Judgment and For Extension of the Summary Judgment Deadline Pursuant to Fed. R. Civ. P. 56(d), and in support thereof, respectfully refers the Court to the accompanying Memorandum in Support.

WHEREFORE, Jesselyn A. Radack respectfully requests that the Court grant the instant motion and enter the attached proposed Order.

Dated: May 29, 2020

Respectfully submitted,

/s/ D. Margeaux Thomas

D. Margeaux Thomas (VSB #75582)

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*Counsel for Defendant Jesselyn A. Radack*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2020, a copy of the foregoing document was filed with the Court electronically. Notice of this filing will be sent automatically by the Court's CM/ECF system to the following parties:

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*Counsel for Plaintiff*

/s/ D. Margeaux Thomas  
D. Margeaux Thomas (VSB #75582)